

Exhibit 3

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

STEPHEN BECKMAN

v.

**BULL HN INFORMATION
SYSTEMS INC.**

CIVIL ACTION NO.: 03-12567-NG

AFFIDAVIT OF DANIEL SCHROEDER

Now comes the Affiant and swears to the truth of the following:

1. From 1966 until August, 2000, I was employed by Bull HN Information Systems Inc. ("Bull HN"). From May, 1993 until the end of 1995, I was the Manager of the Finance Department of the Manufacturing Division in the Lawrence, Massachusetts facility.

2. In my capacity as Manager of the Finance Department of the Manufacturing Division at Lawrence, I supervised a work unit which performed the financial functions associated with the manufacture of certain minicomputer systems at the Lawrence Plant. The jobs performed by my work unit were specific to the Lawrence Plant and the minicomputer systems that were being assembled there, including the GCOS6 line of minicomputers.

3. During 1994, I supervised Stephen Beckman, who was working at the Lawrence Plant as a Financial Planning Analyst II. Mr. Beckman's specific duties included performing financial modeling for the minicomputer systems being assembled and working with planned cost of shipments, surplus and scrap materials at the plant as well as assisting with periodic physical inventories.

4. In 1994, the Manufacturing Division management asked me to look for jobs that could be eliminated or combined, given the decrease in the manufacture of the GCOS6 product line and the transition to contract manufacturing, and to recommend employees for layoff accordingly.

5. After examining my work unit, I selected Mr. Beckman and one other employee for layoff. I chose Mr. Beckman for layoff because the level of volume of his activities had declined. Most of his work effort was devoted to performing financial modeling of new GCOS 6 platforms and as the decision had been made to cease further research and development of the GCOS 6 product line, no new models were going to be introduced and hence, no additional cost modeling was required. In addition, I chose Mr. Beckman for layoff because my department could easily shift Mr. Beckman's remaining activities to two other employees in higher positions who had broader understanding of the total Finance functional requirements and who had the skills to perform critical day-to-day activities.

Signed this 24 day of March, 2005 under the pains and penalties of perjury.


Daniel Schroeder